



Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

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Environmental Management, Inc.
SBC, SWBT Oklahoma, CC 00-217

January 12, 2001

Federal Communications Commission
Commission Secretary
Magalie Roman Salas
445 12th Street S.W.
CY-B402
Washington, D.C. 20554

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Ref: 271 Application, CC Docket No. 00-217, **Reply— Opposition**

Subject: SWBT Oklahoma Long Distance Service Application.

This letter is in response to SBC's replies regarding the 00-217 comments and pricing amendment DA-00-2917. Issues below are referenced by date received at the FCC:

December 1, 2000 -- Mr. Jared Craighead

Mr. Craighead presented a head count list of technicians for each state. Items, which should also be included in this list from SBC, are:

- Year of report (at least last four years)
- Grade level
- Level of experience
- Qualifications
- Locations (area code)
- Full-time/part-time (not to include early retirement buy-outs)
- Contract employee count (technicians)
- On loan to / from another state
- Number of months employed by SWBT at each site / city (not to include early retirement buy-outs)

December 1, 2000— Kellogg, SBC and Ernst & Young

SWBT limited the scope of the Ernst & Young RFP for Missouri performance review. Similar situation: Store check out lines is a related computer workload. Some lines are faster than others due to the speed of the operator and basket quantity. The same is true inside a computer; priority setting control which workload is top dog (head of the line) and which is fed first. To measure performance you need to track the other dogs or checkout lines to obtain real performance. This performance time period set by SWBT for Ernst & Young, lacked the depth of history to dispel the competitors complaint periods.

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List A B C D E

December 7 and 8, 2000

The FCC website did not contain information about the details of the discussion beyond the discussion topic.

December 14, 2000 – Letter

Oklahoma cost of living supports lower prices than Texas.

December 14, 2000 – Letter from Mr. Jared Craighead

Why only a four-month reporting period presented?

December 21, 2000

This document only covers a few months of one year; the performance requirements started in 1996 or 98.

December 28, 2000 SBC Amendment DA-00-2917

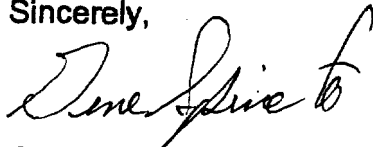
The Department of Justice states a 200% price charge above Texas and now SWBT offers a 25% discount. This leaves a 175% charge above Texas. The price is at least inflated by 75% after discount.

Why is the floor price setting held to the Texas level, where as cost of wages and living is higher than Oklahoma? SWBT is willing to discount rates based on other states' higher cost of living compared to a state that has a lower cost of living. Question: Is this a discriminatory pricing policy? Keep in mind that in 1995 / 1996 SWBT (by a court order or court agreement) returned some monies to each customer for incorrect pricing method in Oklahoma.

January 8, 2001 Metromedia Fiber Network Service, Inc.

In 1999 dark fiber pricing information was requested of SWBT. The SWBT response: dark fiber service does not exist in SWBT Oklahoma.

Sincerely,



Gene Spineto
Telecommunications Manager

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of Environmental Management, Inc. (E.M.I.) was sent to each of the following parties via first class mail.

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